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August 23, 2019

Hon. Joan M. Azrack  
United States District Court  
Eastern District of New York  
100 Federal Plaza  
Central Islip, New York 11722

**Re: Volpe v. Nassau County Police Department, et. al**  
**Case No.: 19:cv-02236-JMA-ARL**

Dear Judge Azrack:

As you are aware, this office represents Defendants Patrick Ryder ("Ryder"), Russell Sacks ("Sacks"), Joseph Massaro ("Massaro"), and the County of Nassau ("County") (collectively referred to as the "Defendants") in the above-referenced matter. We write to respectfully inform the Court that the Defendants intend to move forward with the filing of a Motion to Dismiss Plaintiffs' Charles Volpe and the Police Benevolent Association of the Police Department of Nassau County's (the "PBA") (collectively referred to as the "Plaintiffs") Complaint.

Please be advised that the counsel for all parties have met and conferred, and have established the following briefing schedule, subject to Your Honor's approval: (1) Defendants' Motion to Dismiss shall be served by September 20, 2019; (2) Plaintiffs' opposition shall be served by October 11, 2019; and (3) Defendants' reply shall be served by October 25, 2019. The fully briefed motion shall be filed on October 25, 2019, in accordance with this Court's bundling rule.

Accordingly, we respectfully submit the above briefing schedule for the Courts approval. We thank the Court for its consideration of this request.

Respectfully submitted,

Aaron Solomon, Esq.  
Monique M. Robotham, Esq.

cc.: All parties via ECF